

November 11, 2025

E-Filed

The Honorable Judge Vince Chhabria
450 Golden Gate Avenue
17th Floor, Courtroom 4
San Francisco, CA 94102

Dear Judge Chhabria,

In connection with Plaintiffs’ pending administrative motion, Dkt. 635, Plaintiffs write to inform the Court that Meta emailed Plaintiffs last night that it had collected and would produce more source code files from Xioalan Wang’s computer. *See* Ex. 1. Ms. Wang is a Meta employee who conducted torrenting and peer-to-peer file sharing of hundreds of terabytes of copyrighted works in 2024, and her discovery is highly probative of the issues that remain outstanding in this case.

Plaintiffs respectfully submit this additional production further supports their need for the targeted discovery set forth at Pages 4-5 and Exhibits I (RFAs) & P (30(b)(6) notice) of their motion. *See* Dkt. 635.¹ This production also supports Plaintiffs’ request at yesterday’s hearing that the Court permit Plaintiffs’ torrenting expert, Dr. David Choffnes, to inspect the relevant directories in Meta’s S3://fair-spark/ database for *all* relevant torrenting records and Meta’s backups of the computers used by the Meta engineers who engaged in torrenting, which Meta declines to do.

/s/ Maxwell V. Pritt
Maxwell V. Pritt

¹ In case there is any ambiguity as to Plaintiffs’ request in the last bullet on Page 5 that Meta search AWS EC2 instances in 2022 for the missing logs from Mr. Lample’s torrenting (*see* Opp. at 5, asserting Plaintiffs were asking Meta to search “***all AWS EC2 instances*** used across ***all of Meta***,” emphasis in original), as Plaintiffs previously told Meta, Plaintiffs are only asking it to search the specific AWS EC2 instances, if any, that Mr. Lample used in the Fall/Winter 2022.